

FILED

JUN 06 1994

HOWARD HANSON
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HUB LAW OFFICES

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5 Attorney for Defendant and Cross-Complainant
GERALD ARMSTRONG
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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF MARIN

10 CHURCH OF SCIENTOLOGY INTERNATIONAL,) No. 157 680
11 a California not-for-profit)
12 religious corporation,) NOTICE OF MOTION AND
13 Plaintiff,) MOTION TO COMPEL FURTHER
14 vs.) RESPONSES TO REQUESTS FOR
15 GERALD ARMSTRONG; MICHAEL WALTON;) PRODUCTION AND FOR
16 THE GERALD ARMSTRONG CORPORATION,) SANCTIONS; POINTS AND
17 a California for-profit) AUTHORITIES; DECLARATION
18 corporation; DOES 1 through 100,) OF FORD GREENE; SEPARATE
19 inclusive,) STATEMENT OF REQUESTS AND
20 Defendants.) RESPONSES IN DISPUTE
Date: 6/28/94
Time: 2:30 p.m.
Dept: Referee Benz
Trial Date: 9/29/94

21 TO PLAINTIFF AND CROSS-DEFENDANT CHURCH OF SCIENTOLOGY
22 INTERNATIONAL AND TO ITS ATTORNEYS OF RECORD:

23 PLEASE TAKE NOTICE that on June 28, 1994, at 2:30 p.m., or as
24 soon thereafter as the matter may be heard by the discovery
25 referee, William R. Benz located at 900 Larkspur Landing Circle,
26 No. 185, Larkspur, California, Defendant and Cross-Complainant
27 Gerald Armstrong will seek an Order requiring Scientology to
28 further respond to the Requests for Production that are set forth
more fully in the Statement of Requests and Disputed Responses.
In addition Armstrong seeks an order which awards monetary

1 sanctions against plaintiff and its attorneys, the law firms of
2 Bowles and Moxon, and Wilson, Ryan and Campolongo and against
3 Laurie J. Bartilson and Andrew Wilson.

4 This motion is brought pursuant to Code of Civil procedure
5 sections 2023 and 2031 and is factually predicated on plaintiff's
6 failure to properly respond to certain Requests for Production
7 propounded by Armstrong.

8 This motion is based upon the instant Notice, the
9 accompanying Memorandum of Points and Authorities, Statement of
10 Requests and Responses in Dispute, the Declaration of Ford Greene,
11 Declaration of Gerald Armstrong and all the Court's files and
12 records in this case.

13 DATED: June 6, 1994

HUB LAW OFFICES

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By:

FORD GREENE
Attorney for Defendant and
Cross-Complainant
GERALD ARMSTRONG

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PROOF OF SERVICE

I am employed in the County of Marin, State of California. I am over the age of eighteen years and am not a party to the above entitled action. My business address is 711 Sir Francis Drake Boulevard, San Anselmo, California. I served the following documents: NOTICE OF MOTION AND MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR PRODUCTION AND FOR SANCTIONS; SEPARATE STATEMENT OF REQUESTS FOR PRODUCTION AND RESPONSES IN DISPUTE; DECLARATION OF FORD GREENE IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR PRODUCTION AND FOR MONETARY SANCTIONS; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES TO PRODUCTION FOR REQUESTS FROM PLAINTIFF

on the following person(s) on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California:

MICHAEL WALTON, ESQ.
P.O. Box 751
San Anselmo, CA 94979

Andrew Wilson, Esquire
WILSON, RYAN & CAMPILONGO
235 Montgomery Street, Suite 450
San Francisco, California 94104

LAURIE J. BARTILSON, ESQ.
Bowles & Moxon
6255 Sunset Boulevard, Suite 2000
Los Angeles, California 90028

(By Mail) I caused such envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: June 6, 1994

